

EXHIBIT 24

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION

VIDEOTAPED DEPOSITION OF

WESLEY D. GRIMES

May 9, 2024

10:17 a.m.

Weinberg Wheeler Hudgins Gunn & Dial
3344 Peachtree Road, NE
Suite 2400

Atlanta, Georgia

Reported by: Marsi Koehl, CCR-B-2424

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1 kit was installed on Mr. Elliott's vehicle?

2 A. I don't. I know Mark went up online and
3 tried to get some information of what the lift kits
4 contained and we put that in our report as we
5 understand it. But I'm not looking at a specific
6 model or serial number or anything like that.

7 Q. Do you have any reason to disagree that
8 Rough Country sold this lift kit as a 4.5 inch lift
9 kit?

10 A. I have no information. I have no opinion
11 about that.

12 Q. Do you agree the lift kit was installed
13 properly?

14 A. I have no idea. I don't do lift kit
15 installation analysis.

16 Q. Is it your opinion -- strike that.

17 So I understand your answer to be that
18 you're not saying it was installed improperly, you're
19 not saying it was installed properly, you just don't
20 have an opinion either way; is that fair?

21 A. That's fair, yeah. I know the vehicle had a
22 lift kit.

23 Q. Did you form an opinion about how much the
24 Rough Country lift kit raised the front bumper of the
25 subject F-250?

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1 A. I didn't look at that specifically. I've
2 seen in Mr. Buchner's materials -- I think he said
3 like 5 and-a-half or 6 inches. I don't dispute that
4 it's certainly in that range, but I haven't measured
5 that specifically.

6 Q. So you don't have any disagreement with
7 Mr. Buchner's analysis of how much the Rough Country
8 lift kit raised the front bumper of Mr. Elliott's
9 F-250?

10 A. Well, I didn't look at the front bumper. I
11 looked at the frame rails. And it looks like, again,
12 it's about five to six inches, something like that.
13 Closer to six than to five, but I'm looking at the
14 bottom of the frame rail.

15 Q. You don't have any criticism of Mr.
16 Buchner's analysis on the amount of practical lift on
17 the front of the F-250?

18 A. I haven't looked at it specifically but as I
19 sit here, no.

20 Q. So you have no reason to disagree with his
21 conclusion about how much the lift raised the front
22 frame rail of the F-250?

23 A. As I sit here, no.

24 Q. Ms. Grimes performed a 3D scan of an
25 exemplar Escape on December 20th of 2022, right?

1 Q. And then same question laterally, is
2 negative --

3 A. Negative means --

4 Q. -- left or --

5 A. Negative would mean to the left.

6 Q. Meaning that the force is going from right
7 to left; is that correct?

8 A. That's my recollection. I was reading
9 through the airbag module data here to see if it says
10 and I don't see it offhand.

11 Q. But your --

12 A. But in general negative would be right to
13 left.

14 Q. And you reported -- I think you were getting
15 to this a moment ago. You reported the delta-v for
16 the subject collision at the time of 141 milliseconds
17 after times zero, right?

18 A. Can you ask that again, please?

19 Q. Yeah. And if there's something wrong with
20 the wording, please let me know.

21 You conclude -- scratch that.

22 You reported the delta-v for the subject
23 collision at the time of 141 milliseconds after times
24 zero; is that right?

25 A. Yes.